

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of)	
Telecommunications and Energy on)	
Its own Motion to Implement the)	
Requirements of the Federal Communications)	D.T.E. 03-60
Commission's Triennial Review Order)	
Regarding Switching for Mass Market)	
Customers)	

COMMENTS OF BRIDGECOM INTERNATIONAL, INC.

BridgeCom International, Inc. ("BridgeCom"), pursuant to the Vote and Order to Open Proceeding issued by the Department on August 26, 2003, hereby submits its recommendations regarding the conduct of the Department's inquiry into the extent of the impairment competing carriers would suffer in their ability to serve mass market customers in the absence of unbundled access to the local circuit switching facilities of Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon").¹

The undertaking with which the Federal Communications Commission ("FCC") has tasked the Department is a herculean one – *i.e.*, to conduct and conclude within nine months what will amount to a full scale analysis of the telecommunications marketplace. Given the critical importance of this inquiry not only to competitive local exchange carriers ("LECs") such as BridgeCom that provide service through use of the unbundled network element platform ("UNE-P"), but to the multitude of consumers who have availed themselves of the benefits of the competitive alternatives provided by UNE-P carriers, it is imperative that the Department conduct its inquiry as an adjudicatory proceeding, with the full opportunity for parties to develop the record through such

¹ BridgeCom has also joined with a number of other competitive providers, loosely referred to as the Loop/Transport Carrier Coalition, in offering recommendations regarding the conduct by the Department of its inquiry regarding unbundled access to various loop and transport facilities.

procedural vehicles as discovery and cross-examination. That having been said, it is equally important for the Department to utilize all tools available to it to both streamline and manage its inquiry to the greatest extent possible. In furtherance of this end, BridgeCom offers the following recommendation.

In order to narrow the scope of its inquiry, allowing the resources of both the parties and the Department to be focused on matters truly in dispute and not expended unnecessarily, BridgeCom recommends that the Department require Verizon, at the outset of the proceeding, to identify geographic areas, if any, within the Commonwealth in which it believes that either of the “competitive triggers” established by the FCC are satisfied. BridgeCom does not believe that there are any markets within the Commonwealth in which three or more unaffiliated competitive providers of local exchange service serve mass market customers using their own switching facilities or in which two or more unaffiliated competitive providers of local exchange service provide wholesale mass market services using their own switching facilities. If Verizon does not disagree with this assessment, the parties can immediately turn their attention to the more traditional impairment analysis, addressing the various operational and economic impairment issues that must be resolved. If Verizon does disagree, it should be required to promptly identify both the geographic areas in which it believes the triggers are met and the competitive providers it believes satisfy the triggers, allowing the parties and the Commission to focus on whatever limited areas Verizon intends to assert that competitive triggers are met.

In this one simple way, the Department can greatly streamline its inquiry, allowing what little time the FCC has afforded it to conduct and conclude that inquiry to be dedicated to matters which are truly in dispute.

BRIDGECOM INTERNATIONAL, INC.

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